

FILED
Clerk
District Court

SEP 24 2007

For The Northern Mariana Islands
By _____
(Deputy Clerk)

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8 UNITED STATES DISTRICT COURT
9 NORTHERN MARIANA ISLANDS

10 UNITED STATES OF AMERICA,) Criminal Case No. 07-00014-001
Plaintiff,)
11 v.) GOVERNMENT'S MOTION FOR
SUBSTANTIAL ASSISTANCE
12 ANTONIETA BONIFACIO AGUON,) DEPARTURE UNDER U.S.S.G. § 5K1.1
AND 18 U.S.C. § 3553(e)
13 Defendant.)
14 _____)

15 COMES NOW the plaintiff, UNITED STATES OF AMERICA, by and through its counsel,
16 Leonardo M. Rapadas, United States Attorney, and Eric S. O'Malley, Assistant United States Attorney,
17 and hereby moves the Court, pursuant to United States Sentencing Guidelines § 5K1.1 and
18 18 U.S.C. § 3553(e), to depart from the Sentencing Guidelines based on the defendant's substantial
19 assistance to the Government. The Government recommends that the Court depart downward to
20 advisory Guidelines **Level 15**.

21 The Government intends to make its specific recommendation at the sentencing hearing.

22 LEONARDO M. RAPADAS
United States Attorney
23 Districts of Guam and the N.M.I.

24 Date: September 24, 2007

25 By:


ERIC S. O'MALLEY
Assistant United States Attorney